

This section briefly summarizes revisions to the Proposed Action and new information potentially relevant to Project environmental concerns which has come to the attention of BLM and Western since the Draft EIS was distributed in June 2001.

Caithness or its agents (Caithness and ADWR 2001; Greystone 2001; Koblitz 2001a,b,c,d,e; Looper 2001a,b; and Steltenpohl 2001) and Western (Swanson 2001) provided the information for this Chapter. Complete source information can be found in Section 4.0, References Cited.

## **2.1 PROPOSED POWERPLANT AND ASSOCIATED FACILITIES**

### **2.1.1 Combustion Turbines and Generators**

Caithness has proposed to install an oxidation catalyst that would reduce the emissions of carbon monoxide (CO) by 75 percent and volatile organic compounds (VOC) by 50 percent from those presented in Table 3.1-5 of the Draft EIS. Many of the Hazardous Air Pollutants (HAP) resulting from the combustion of natural gas are also VOCs. The oxidation catalyst would also control approximately 50 percent of combustion Hazardous Air Pollutant (HAP) emissions presented in Table 3.1-7 of the Draft EIS. The addition of the oxidation catalyst would represent Best Available Control Technology (BACT) for both CO and VOC emissions (Greystone 2001).

Caithness has reported that the turbine manufacturer guaranteed a reduced amount of predicted particulate emissions from the combustion turbine, which would limit the maximum particulate emission during 100-percent load with supplemental duct firing to 18 pounds per hour, per turbine (Greystone 2001).

Caithness has also reported that the turbine manufacturer stated that the attainable ammonia slip from the selective catalytic reduction has been reduced from 10.0 parts per million (ppm) to 7.5 ppm (Douglas 2001).

Caithness has submitted a revised air permit application to the Arizona Department of Environmental Quality New Source Review Unit/Air Quality Division (Massey 2001, Douglas 2001).

### **2.1.2 Heat Recovery Steam Generators and Air Pollution Control Equipment**

Caithness has now committed to install high-efficiency drift eliminators on the cooling towers, reducing the mist and/or droplets leaving the cooling towers to less than 0.0005 percent of the circulating water rate. The drift eliminators represent BACT for the cooling towers (Greystone 2001).

Caithness has revised the height of each exhaust stack upwards from 130 feet as stated in the Draft EIS to 150 feet for Phase I and 165 feet for Phase II (Douglas 2001).

### **2.1.3 Waste Management**

Caithness has revised plans for the sediment and evaporation ponds for the proposed plant site.

**2.1.3.1 Sediment Ponds**

Caithness has revised the Drainage Plan for the plant site, presented in the Draft EIS as Figure 2-15. Caithness has also revised the Stormwater Pollution Prevention Plan included in the Draft EIS as Appendix A and discussed in Section 2.2.8.4 of the Draft EIS. Stormwater would no longer flow into the evaporation ponds, but instead would flow into separate sediment ponds (Steltenpohl 2001). These unlined ponds would function as infiltration basins; they would be sized to meet the design criteria presented in the Draft EIS for the evaporation ponds (which were formerly designed to hold both stormwater and cooling tower blowdown) (Doenges 2001). Four sediment ponds located along the southern and western boundaries of the plant site would permanently disturb three acres (Koblitz 2001d). Figure 1, the revised Drainage Plan Map (Koblitz 2001d) shows the locations of the sediment ponds.

**2.1.3.2 Evaporation Ponds**

Caithness has revised both the design and location of the evaporation ponds (originally described in Section 2.2.1.6, Waste Management and presented in Figure 2-4a of the Draft EIS). Instead of two evaporation ponds covering 18 acres, Caithness now proposes three evaporation ponds covering approximately nine acres (Steltenpohl 2001) and disturbing 13 acres (Koblitz 2001d). Caithness has also revised the pond design to include a double high-density polyethylene (HDPE) liner instead of the single HDPE liner and one clay liner described in the Draft EIS (Koblitz 2001b). In addition, stormwater would no longer be directed into the evaporation ponds. The location of the three proposed evaporation ponds is depicted in Figure 1, Drainage Plan Map.

**2.1.4 Emergency Access Road**

Caithness has proposed a new emergency access road to enhance plant security and safety. It will enter the proposed plant site from the north (Steltenpohl 2001, Koblitz 2001b). The emergency access road would disturb six acres (Koblitz 2001d). This road would not be used daily, and would be bladed but not paved (Doenges 2001). See Figure 1, Drainage Plan Map for the location of the road.

**2.1.5 Plant Site Fence Line**

Caithness has revised the fence line along the northern side of the proposed plant site to enclose the new emergency access road (Koblitz 2001e). Before this revision, the fence line closely paralleled the off-site storm water ditch shown in Figure 2-15 of the Draft EIS. The location of the revised fence line and storm water ditch are shown on Figure 1, Drainage Plan Map.

**2.1.6 Area of Ground Disturbance**

Revisions to Caithness' Proposed Action have caused revisions and additions to the lands to be disturbed for the proposed powerplant and immediate site facilities as presented in Table 2-5, Summary of Ground Disturbance Activities, of the Draft EIS. The cut/fill area has been revised from seven to 14 acres and the evaporation ponds from 18 to 13 acres; new activities include three acres for sediment ponds, and six acres for the emergency access road (Koblitz 2001d).

Agricultural development that would have disturbed 107 acres would not occur (see Section 2.5 below). The area to be disturbed has been reduced by 96 acres. Cut/fill volume associated with the revised plant layout is essentially the same as previously presented (Koblitz 2001b).

## **2.2 TRANSMISSION SYSTEM MODIFICATIONS**

### **2.2.1 Communication Facilities**

Section 2.2.2.3 of the Draft EIS described a communication tower that Western would install within the proposed substation next to the substation control structure. A microwave dish about 10 feet in diameter would be installed on the tower, which would allow Western's Desert Southwest Region Operations Center in Phoenix to operate the equipment remotely through a Supervisory Control and Data Acquisition system. The Draft EIS states that the tower was expected to be less than 60 feet tall. Western now proposes a tower height of 160 feet (Swanson 2001). Section 2.2.8.8 of the Draft EIS stated that all structures associated with the proposed powerplant site would be surface treated (dulled or painted with desert tones); Western now proposes that the communication tower would be galvanized steel rather than surface treated (Swanson 2001).

## **2.3 ACCESS ROAD**

Caithness has proposed an optional alignment for the access road to the plant site (Doenges 2001). Figure 3, Proposed Access Road shows the location. The access road would be built to the same specifications as described in Section 2.2.7.4 of the Draft EIS; if selected it would also be a Mohave County Road. The optional alignment would enter and leave the plant site at the same location, but would intersect U.S. 93 south of the proposed access road alignment described in the Draft EIS. Caithness would determine which access road would be built (assuming that either option is approved by the agencies).

Wetland #2 is located immediately south of the proposed access road at the proposed plant site. The Draft EIS states that about 0.64 acre of this wetland would be on Project property. Caithness has revised the grading (cut and fill) for the proposed plant site, including the access road described in the Draft EIS, which increases the area of direct impact to Wetland #2, as defined in the Draft EIS (Section 3.12.1.1). The area of proposed fill in Wetland #2 is 0.08 acres as depicted in Figure 1, Drainage Plan Map.

## **2.4 NATURAL GAS SUPPLY PIPELINE**

### **2.4.1 Route Modification**

The Draft EIS uses a corridor concept to identify and analyze alternative natural gas pipeline routes. Rather than identifying a specific alignment for the pipeline right-of-way, the routes follow broader corridors that allow adjustments in the final engineered alignment of the pipeline, to accommodate constraints identified during preconstruction surveys and right-of-way negotiations. Both the proposed and alternative pipeline corridors consist of various combinations of 13 individual corridor segments, assigned alphanumeric designations and described in Section 2.2.5, Natural Gas Supply Pipeline, of the Draft EIS. The route described in

the Draft EIS for the gas pipeline as the Proposed Action follows this sequence of corridor segments:

R1 – C1 – T3 – C3 – T4 – R5

Because of acquisition of rights-of-way associated with the Proposed Action presented in the Draft EIS, Caithness (Steltenpohl 2001) revised the Proposed Action route as follows:

T1 – T2 – T3 – C3 – T4 – T5

This revised Proposed Action route is the same as that described as Alternative T in the Draft EIS (see Section 2.3.1.2 of the Draft EIS). See Figure 2, Proposed and Alternative Natural Gas Pipeline Corridors.

## 2.4.2 Expansion of Corridor Segments

Caithness (Koblitz 2001b) has revised the width of natural gas pipeline corridor segments T1 through T5, described in the Draft EIS in Table 2-2, Corridor Segment Descriptions. The revised corridor descriptions are as follows:

- T1: This corridor segment begins north of Interstate 40 at the northernmost potential natural gas supply pipeline in Section 30, T21N, R13W, and extends south about 3.7 miles to Old Highway 93 in Section 18, T20N, R13W. This corridor segment includes both the 150-foot-wide right-of-way for the Mead-Liberty Project 345-kV transmission line and the 175-foot-wide right-of-way of the Mead-Phoenix Project 500-kV transmission line immediately to the east. On the west, it also extends 1,000 feet to the west of the Mead-Liberty Project right-of-way. To the east of the Mead-Phoenix Project right-of-way, the corridor segment extends 5,000 feet east from the northern end south to Interstate 40, then diagonally southeast to a point approximately 1,000 feet east of the northwest corner of Section 5, T20N, R13W. To the south of this point, the corridor segment includes all of the area east of the Mead-Phoenix right-of-way in Sections 6, 7, and 18, and the western-most 1,000 feet of Sections 5, 8, and 17, T20N, R13W. This corridor segment crosses private and State Trust land.
- T2: This corridor segment begins at the southern end of corridor segment T1 and follows along the same transmission line rights-of-way as corridor segment T1 for a length of about 2.1 miles into Section 30, T20N, R13W. The corridor segment includes both the 150-foot-wide right-of-way for the Mead-Liberty Project 345-kV transmission line and the 175-foot-wide right-of-way of the Mead-Phoenix Project 500-kV transmission line immediately to the east, and extends 1,000 feet to the west of the Mead-Liberty Project right-of-way. The corridor segment also includes all of the area east of the Mead-Phoenix Project right-of-way in Sections 18 and 19 and the western-most 1,000 feet of Sections 17 and 20, T20N, R13W. This corridor segment crosses private and State Trust land.
- T3: This corridor segment begins at the southern end of corridor segment T2 and follows the same transmission line rights-of-way south as corridor segment T2 for about 8.5 miles to Section 5, T18N, R13W where corridor segment C3 begins. This corridor segment includes both the 150-foot-wide right-of-way for the Mead-Liberty Project 345-kV transmission line and the 175-foot-wide right-of-way of the Mead-Phoenix Project 500-kV transmission line immediately to the east, and extends 1,000 feet to the west of

the Mead-Liberty Project right-of-way and 1,000 feet to the east of the Mead-Phoenix Project right-of-way. In addition, beyond the 1,000-foot corridors on either side of the rights-of-way, to the west the corridor segment includes the eastern-most 1,000 feet of Sections 7, 18, and 19, T19N, R13W, and to the east the corridor segment includes the western-most 1,000 feet of Sections 29 and 32, T20N, R13W. This corridor segment crosses private and State Trust land.

- T4: This corridor segment begins in Section 16, T18N, R13W, just south of corridor segment C3. This corridor segment is about 13.8 miles long, terminating at the intersection of the transmission line rights-of-way and U.S. 93. This corridor segment extends 1,000 feet west and east of the 150-foot-wide right-of-way for the Mead-Liberty Project 345-kV transmission line and the adjacent 175-foot-wide right-of-way for the Mead-Phoenix Project 500-kV transmission line and includes both rights-of-way, for a total corridor segment width of 2,325 feet. The corridor segment increases from a width of 1,000 feet to a width of 4,000 feet west of the Mead-Liberty Project right-of-way for a distance of approximately 4.0 miles from the northern boundary of Section 34, T17N, R13W, south to the boundary between T16.5N and T16N. At this point the western edge of the corridor segment runs southeast to the point in Section 4, T16N, R13W, 1,000 feet southwest of the turning point of the western edge of the Mead-Liberty Project right-of-way. These expansions allow for complete avoidance of the Carrow-Stephens Ranches ACEC and rugged topography. This corridor segment crosses privately owned, BLM-managed public, and State Trust lands.
- T5: This corridor segment begins at the southern end of corridor segment T4 and extends southeast about 7.8 miles to the plant site. This corridor segment extends 1,000 feet west and east of the 150-foot-wide right-of-way for the Mead-Liberty Project 345-kV transmission line and the adjacent 175-foot-wide right-of-way for the Mead-Phoenix Project 500-kV transmission line and includes both rights-of-way, for a total corridor segment width of 2,325 feet, except to accommodate a perpendicular crossing of the Big Sandy River in one of two ways. The first is a corridor segment which leaves the transmission lines rights-of-way to become a 3,000-foot-wide corridor centered on the northern and eastern boundary of Section 10, T16N, R13W. The other is a 2,000-foot-wide corridor centered on the southern boundary of Section 10, T16N, R13W.

## **2.5 AGRICULTURAL DEVELOPMENT**

Caithness has withdrawn the agricultural development described in Section 2.2.6 of the Draft EIS (Prenger 2002). Caithness would no longer supply about 107 acres of land within Section 7 to MCEDA for agricultural use. This could reduce the proposed Project water use by up to 400 gallons per minute (650-acre-feet per year), and would reduce Project surface disturbance by 107 acres (see Section 2.1.6).

## **2.6 ACTIONS TO REDUCE OR PREVENT ENVIRONMENTAL IMPACTS**

As described in Section 2.2.8 of the Draft EIS, the Proposed Action includes plans to reduce or prevent environmental impacts. Since publication of the Draft EIS, Caithness has revised or added to several of these described actions. Caithness has committed to each action or plan summarized below.

### **2.6.1 Creation of a Conservation Easement**

Caithness would grant a conservation easement (Conservation Easement) on its land within the floodplain of the Big Sandy River south of Wikieup to the AGFD to protect critical areas of riparian habitat along the Big Sandy River for the benefit of the southwestern willow flycatcher and the Yuma clapper rail. The Conservation Easement would restrict Caithness' use of the property covered by the Conservation Easement to (1) maintaining existing roads; (2) constructing, maintaining, and inspecting the pipeline system and monitoring systems required by the Riparian Easement described in Section 2.6.3, below; and (3) other activities compatible with the preservation, protection, and restoration of wildlife habitat and riparian values. This is a new action since the publication of the Draft EIS.

### **2.6.2 Use of Water on the Banegas Ranch and Severance and Transfer of Water Rights**

Before the powerplant begins commercial operation, Caithness would cease irrigation at the Banegas Ranch (located along the Big Sandy River southwest of the proposed plant site). Recent, historic consumption of water diverted from the Big Sandy River for this purpose was estimated at 300 acre-feet per year in the Draft EIS. Through deed restrictions or other means, Caithness would also prohibit the use or diversion of either existing or new surface or groundwater for irrigation of the Banegas Ranch parcels. Under state law, Caithness would also seek to transfer all surface water rights and claims associated with the Banegas Ranch (exclusive of "base water" rights attached to grazing allotments) to the AGFD as the holder of the Conservation Easement before commercial operations begin at the powerplant. The transferred water rights would be dedicated to recreation and wildlife, including fish. Consistent with state law and ADWR practice, ADWR would determine the legal quantity of these surface water rights during the process of transfer. The severance and transfer of the water rights to the AGFD is a new action since the publication of the Draft EIS. The cessation of irrigation at the Banegas Ranch is a revision to the proposal in Section 2.2.8.5 of the Draft EIS to incrementally stop using Big Sandy River water diverted to irrigate the Banegas Ranch to augment the flow of the Big Sandy River.

### **2.6.3 Groundwater Monitoring Plan, and Flow Augmentation and Monitoring**

In consultation with ADWR and others, Caithness (2001) has prepared a draft *Deed of Easement for Riparian Maintenance of the Banegas Ranch Area of the Big Sandy River* (Riparian Easement). The stated purpose of the Riparian Easement is to create a riparian maintenance program to protect the ecosystem from potential Project-related degradation by monitoring and maintaining base flow conditions for an identified area of marsh and riparian habitat along the Big Sandy River south of Wikieup, Arizona. The Riparian Easement is intended to bind Caithness and any successors in interest in the Project or the Banegas Ranch land parcels purchased by Caithness. While the Riparian Easement has not yet been granted by Caithness, nor has any agency of the State of Arizona, including ADWR, yet agreed to participate in the implementation of the Riparian Easement as spelled out in this summary, Caithness has proposed that the Riparian Easement include the following key elements, which revise or supplement the actions to reduce or prevent environmental impacts presented in Section 2.2.8.3 (Groundwater Monitoring Plan) and Section 2.2.8.5 (Flow Augmentation and Monitoring) of the Draft EIS. (For the purpose of this summary, the ADWR is assumed to be the arm of the State of Arizona

which would participate in the implementation of the Riparian Easement. However, which agency of the State of Arizona, if any, would serve this role has not yet been determined.)

**Groundwater and Surface Water Monitoring Program** – Caithness would undertake a defined groundwater and surface water monitoring program for the southern Big Sandy Basin. Data would be collected from three piezometers installed in the alluvium at or near the marsh at locations, where groundwater levels are expected to coincide with water levels in the marsh, and from existing and proposed wells in the upper, middle, and lower aquifers. Caithness would also create a surface water gauging station equipped for continuous monitoring on the Big Sandy River down river of the marsh near the BLM flow monitoring location, as well as monitor river stream flow monthly via hand measurements at the Highway 93 bridge or at the diversion point for the Banegas Ranch irrigation canal immediately downstream. All measurements would be reported monthly to ADWR, BLM, and USFWS and posted monthly on a public Internet page, and the Big Sandy River gauging data (and data from one of the piezometers) would be posted continuously to the public Internet page. These actions would refine the groundwater monitoring program proposed in Section 2.2.8.3 of the Draft EIS, supplemented by the collection of data from the three piezometers in or near the marsh and the surface water gauging station data.

**Establishment of Mitigation Thresholds** – Caithness would analyze the groundwater and surface water data collected by Caithness and others to determine the correlation between the recorded surface water base flows and the groundwater elevations at the marsh. Caithness would gather at least 18 months of data in support of the threshold analysis, and may include analysis data from the USGS monitoring station on the Big Sandy River downstream of Wikieup (Station 09424450), which is downstream of the BLM Big Sandy River monitoring location downstream of the marsh. ADWR would then use this analysis to reasonably establish threshold levels that would trigger the implementation of the specified actions described below. Four thresholds would be established for the period of consistently lowest flow based on the analysis of the data at or above the following levels:

1. “Base” level: 100th percentile (surface flow rate or groundwater levels exceeded by 100 percent of the data).
2. “Minimum” level: “Base” level plus 0.1 cfs for surface flows, and the correlating levels in the piezometers for groundwater levels.
3. “Augmentation” level: “Base” level plus 0.2 cfs for surface flows, and the correlating levels in the piezometers for groundwater levels.
4. “Alert” level: 95<sup>th</sup> percentile level (surface flow rate or groundwater levels exceeded by 95 percent of the data).

This is a new action since the publication of the Draft EIS.

**Water Augmentation Plan** –Before commercial operation of the Project powerplant begins, Caithness would develop, and get ADWR approval for, a detailed water augmentation plan to ensure that surface water flow rates at the new gauging station and groundwater levels as measured at the marsh do not decrease below the established “Minimum” threshold levels as a result of groundwater pumping for the Project. The

water augmentation plan would provide for the installation of a system to treat and deliver groundwater pumped from the lower aquifer to a point immediately upstream of the marsh as necessary to ensure that surface water flow rates and groundwater levels do not fall below the “Minimum” threshold level. Caithness must have all necessary permits and approvals before the powerplant begins commercial operation. Caithness must reasonably demonstrate the ability to produce and deliver, within 30 days, water to the marsh both of a quality sufficient to meet permit discharge requirements and a quantity sufficient to meet anticipated water augmentation requirements.

If surface water flow rates or groundwater levels fall below any established “Alert” level for five consecutive days, or 10 days in a 15-day period, Caithness would complete the installation of the water delivery system and be prepared to deliver water within 30 days. If surface water flow rates or groundwater levels fall below any established “Augmentation” level, Caithness would immediately (or as soon as the water delivery system is installed and operational) begin delivering treated water to the Big Sandy River with the intent to restore and maintain all surface water flow rates and groundwater levels at or above the established “Augmentation” levels. If any monitored surface water flow rates or groundwater levels remain below the “Augmentation” level for five consecutive days, or 10 days in any 20-day period, or if any of the surface water flow rates or groundwater levels fall below any “Minimum” levels, ADWR may direct Caithness to modify the Augmentation plan to implement additional and/or different mitigation measures. Measures may include laying additional pipe and reducing or stopping groundwater pumping for the Project powerplant. Any additional mitigation measure(s) directed by ADWR would be reviewed annually by ADWR.

This program supplements the water augmentation plan originally proposed in the Draft EIS. It requires augmentation based on measured values to maintain flows above the base flow or base elevation levels.

**Termination and Modification of Water Augmentation Plan** – The Riparian Easement stipulates that Caithness would continue the monitoring and augmentation plans for the life of the Project and until monitored surface-water flow rates or groundwater levels remain above the “Augmentation” level for either (1) 30 years, or (2) 10 years, and Caithness and ADWR agree that there is no need to continue. The Riparian Easement could also be terminated if, in the judgment of the ADWR, actions by third parties or events beyond the parties’ control (such as destruction of most or all of the riparian habitat by others, extreme drought, or interception of augmented water by others) frustrated the purpose of the Riparian Easement. This is a new action since the publication of the Draft EIS.

**Riparian Maintenance Trust Fund** – Caithness would provide financial assurance for ensuring the monitoring and augmentation. This supplements and refines the financial assurance mechanisms spelled out in the Draft EIS.



**Conservation Easement** – The Riparian Easement requires Caithness to grant a Conservation Easement to AGFD as discussed in Section 2.6.1 above.

**Water Use Restrictions** – The Riparian Easement requires Caithness to implement water use restrictions on certain property as discussed in Section 2.6.2 above.

**Surface Water Rights Transfer** – The Riparian Easement requires Caithness to sever and transfer certain surface water rights to AGFD as discussed in Section 2.6.2 above.

Caithness would also implement the program of monitoring data review and analysis; conceptual and numerical model review and potential revision (in light of the monitoring data collected, reviewed and analyzed); and augmentation of the water flow in the Big Sandy River, as generally described in the Draft EIS (and consistent with the changes to this program described above), to ensure that the Project groundwater pumping and consumption does not reduce annual surface water flows in the Big Sandy River. Additional augmentation of water flow in the Big Sandy River, above and beyond that required by the Riparian Easement, would be required if and when the numerical model predicts an annual reduction of groundwater flow from the middle aquifer to the upper aquifer/surface water that is attributable to the Project and that exceeds the 300 af estimated as that water left in the Big Sandy River through the cessation of irrigation of the Banegas Ranch (or the amount of historic water use by the Banegas Ranch as may be determined by ADWR in the water rights transfer described in Section 1.1.2).

If additional augmentation is required, water would be added annually to the Big Sandy River/marsh in an amount equal to the reduction in groundwater flow attributable to the Project that is predicted by the model for the following year, less credit for 300 af (or the amount of historic water use by the Banegas Ranch as may be determined by ADWR in the water rights transfer described in 1.1.2) and credit for any water added to the Big Sandy River under the augmentation plan during the current year. Should conditions on the Big Sandy River at the time of augmentation suggest that a modification to this plan should be considered, BLM, following discussions with Caithness, shall reconsult with USFWS to determine whether the additional augmentation is necessary and/or desirable in light of current wildlife and water resource concerns.

#### 2.6.4 Actions to Compensate for Predicted Impacts on Cofer Hot Spring

Cofer Hot Spring is located about 2.5 miles northeast of the proposed plant site and is depicted in Figure 3.5-2, Surface Water Resources Map of the Big Sandy Basin, of the Draft EIS. The spring is privately owned. Flows from the spring reportedly range from 20 to 180 gallons per minute. The spring is the “base” water source for livestock grazing public lands in the Hot Springs Allotment. The spring supports approximately 10 acres of palm orchard, which are of commercial value to the property owner, and a wetland and pond, which provide potential habitat for the Yuma clapper rail (see Section 2.7.3) (Strong 2001). Hydrologic analysis in the Draft EIS projected a reduction and possible elimination in spring flow due to groundwater pumping for the proposed Project. Section 2.2.8.6 of the Draft EIS, Actions to Compensate for Predicted Impacts on Cofer Hot Spring, states that Caithness has agreed in concept with the owner of the spring to provide a well to replace any water lost from reduction in the spring’s flow and that the owner would use existing shallow wells for watering cattle. After the Draft EIS was issued, both the landowner and Caithness reported to BLM and Western that Caithness does not have an

agreement in concept with the owner of Cofer Hot Spring (Adams 2001; Koblitz 2001a and 2001c).

Cofer Hot Spring, as a traditional cultural property (TCP), is addressed below in Section 2.7.2, Additional Traditional Cultural Properties.

## **2.7 NEW INFORMATION**

The information presented in this section was not known at the time the Draft EIS was prepared.

### **2.7.1 Cultural Resources at Proposed Plant Site**

The Draft EIS states that construction at the proposed powerplant site would destroy part of a single archaeological site, AZ M:6:47 (Arizona State Museum [ASM]), and that data recovery studies would be conducted to mitigate those impacts. After assessing revisions to the proposed plant site, particularly the identification of an emergency access route, it was determined that two other archaeological sites, AZ M:6:46 (ASM) and AZ M:6:55 (ASM), would be affected by revised construction plans. Site AZ M:6:46 (ASM) was considered potentially eligible for the National Register, but archaeological testing found the site does not appear to be eligible (White and Rogge in preparation a). Site AZ M:6:55 (ASM) is evaluated as ineligible for the National Register (White and Rogge in preparation b). Section 106 consultation regarding these determinations is ongoing.

### **2.7.2 Additional Traditional Cultural Properties**

The Draft EIS explained that Hualapai Nation members consider the Big Sandy Valley an integral part of their aboriginal territory and a traditional cultural landscape. Water sources, including the Big Sandy River and numerous springs scattered throughout the valley and adjacent mountains, are recognized as particularly important elements of that landscape. However, after the Draft EIS was issued in June 2001, the Hualapai Nation identified specific TCPs of particular concern within this traditional cultural landscape. One TCP is a cemetery with 10 graves, located about 1.75 miles from the proposed plant site and 0.25 mile outside of the proposed pipeline corridor (Rogge et al. 2001).

Another TCP of special concern is Cofer Hot Spring itself. Although the Hualapai have not had access to the spring in decades (Rogge 2001a), they stated that they regard it as a medicine spring and an important feature of their traditional territory. The spring is on privately owned land approximately 2.5 miles from the proposed plant site. The traditional perception of its healing qualities may stem from the fact that it is a hot spring in an area with few hot springs. This spring is also mentioned in the Salt Songs (see Section 3.15.1.2 in the Draft EIS). Western and BLM have concluded, in consultation with the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP), that Cofer Hot Spring is eligible for the National Register of Historic Places under Criterion A.